COMMENTS ON DRAFT FINAL PROPOSED INTERIM MEASURE/INTERIM REMEDIAL ACTION PLAN AND DECISION DOCUMENT FOR 881 HILLSIDE AREA

Section 2.1.6.2. In light of the data validation study performed by Argonne National Laboratory, conservative analyses of the soils data must be summarized for inclusion within this report. Specifically, until further field work is conducted at the 881 Hillside to verify or refute the presence of both volatile and semi-volatile constituents, the previous soils evaluation must be presented. More than 3 of the 23 boreholes were contaminated and the soils were contaminated with more than PCE, TCE and 1,1,1-TCA.

Section 2.1.6.3. It should be stated that recent valid sampling of the ponds within Woman Creek indicate that there are no VOC's present.

Section 3.2. The schedule presented must reflect the extension of the public comment period. The procurement dates for the Ion Exchange System seem to be in error.

Section 3.3. The chemical specific ARAR for gross beta is 4 mrem/yr (a National Interim Primary Drinking Water Regulation) or 50 pCi/l (a SDWA MCL), whichever is more stringent.

Section 3.3.1. The Chemical Specific ARAR for antimony is exceeded. It appears that the Chemical Specific ARAR for nitrate is exceeded. The RCRA Subpart F standard for 1,2 Dichloroethane is 5 ppb. This is a final MCL.

Section 4.3. Table 4-1 presents the basis for design of the 881 Hillside treatment technology as based on a flow weighted average of the footing drain and alluvial groundwater collected by the french drain. Is the source well included in the design basis for the treatment technology?

Section 4.5.1.1. Figure 4-9 shows the 6" perforated pipe placed above the drain sump. The top of the sump shall be located approximately two feet below the interface of the 10^{-6} cm/s hydraulic conductivity bedrock and bedrock or alluvial soils having greater than 10^{-6} cm/sec hydraulic conductivity. The perforated pipe should be placed so that liquid cannot accumulate above the level of the lined sump, i.e. the top of the pipe should be placed below the top of the sump.

Section 4.5.3.2. The last paragraph states this action is a removal. This action is an IRA. Delete the statement.

Section 6.0. As the soil boring program is scheduled for mid-October through mid-January, the driest time of the year, placement and frequent monitoring of permanent piezometers

downgradient of SWMU 119.2 is recommended to evaluate the saturated or unsaturated conditions downgradient of the site.

It should be noted that the 15 feet into bedrock calculation for interception of dipping sandstones is dependent on the relative elevation of the top of bedrock. If the adjacent western borehole bedrock elevation is lower than the elevation of bedrock in the borehole being drilled, 15 foot penetration into bedrock may not intercept a dipping sandstone identified in the adjacent borehole.

It might be prudent to maintain and archive the bedrock cores for potential future submittal for laboratory permeability testing. This contingency could be used if the in-situ permeability testing proposed does not generate acceptable information.